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U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION

William M. Schmalfeldt,

Plaintiff,

vs.

Patrick G. Grady,

Defendant

Case No.: No. 1:15-cv-01241-RDB

**MOTION FOR A ONE-WEEK EXTENSION OF TIME TO FILE**

NOW COMES Defendant Patrick G. Grady for the purpose of filing this motion for a brief extension of time to file a Reply to "Plaintiff's Reply to Def[e]ndant's Motion to Dismiss without waiving any rights of jurisdiction, notice, process, service of process, or venue. In support of this motion he states the following:

**BACKGROUND**

1. On June 9, 2015, Mr. Grady filed a Motion to Dismiss For Lack of Personal Jurisdiction in the instant case.
2. On June 15, 2015, Plaintiff William M. Schmalfeldt filed a Response to the Motion to Dismiss.
3. On June 11, 2015, Plaintiff claimed he had served his Response on Mr. Grady.
4. According to the Federal Rules of Civil Procedure and local rules, a reply to that Response is due no later than June 29, 2015.
5. On February 23, 2015, Plaintiff William M. Schmalfeldt filed suit against two real persons, WJJ Hoge III and Eric P. Johnson, and one or two other anonymous persons writing as

“Howard Earl” and “Paul Krendler” in a case styled *Schmalfeldt v. Hoge, et al.*, Case No. 13C15102498 (2015).

6. In that case, Plaintiff Schmalfeldt stated that he did not know who “Paul Krendler” was or where he was located.

7. In the instant case, Plaintiff claims that Mr. Grady is “Paul Krendler.” For the purpose of this Motion to Dismiss, the court must assume that this allegation is true, regardless of the actual facts.

8. On June 23, 2015, Judge Kramer dismissed *Schmalfeldt v. Hoge, et al.*

9. Mr. Grady believes that it is extremely probable that Judge Kramer ruled that the State of Maryland cannot exercise personal jurisdiction over “Paul Krendler.”

10. Mr. Grady also believes it is likely Judge Kramer’s Memorandum Opinion in *Schmalfeldt v. Hoge et al.* will be extremely useful in the resolution of the instant case. He believes the decision is very likely to have persuasive authority, and it may even have a preclusive effect.

11. Mr. Grady will not be able to acquire a copy of Judge Kramer’s Memorandum Opinion until Thursday, June 25, 2015 at the soonest.

#### **REASONS FOR GRANTING LEAVE**

12. The duration of the extension is brief. At present, Mr. Grady does not expect to receive a copy of the Dismissal Order in the State Case until June 25, 2015 at the earliest. The Reply is due on June 29, 2015, and he requests an additional week to review the decision and incorporate it into the Reply. On information and belief the Circuit Court for Howard County

found that the acts alleged in *Hoge* against Paul Krendler did not provide jurisdiction under Maryland's Long Arm Statute.

13. Mr. Grady is a *pro se* party and not experienced in proper legal writing. He needs this brief extension to properly craft his reply given this new information. This may be simple for an experienced litigator, but Mr. Grady is new to this.

14. The resolution of the jurisdiction question in *Schmalfeldt v. Hoge et al.* may provide additional findings and precedent to aid in the consideration of this case.

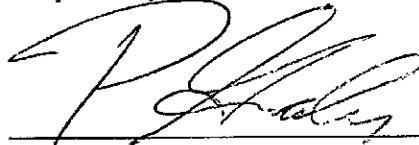
15. With this new Memorandum Opinion available, and with the potential influence it could bring to the instant case, an extension is reasonable and serves the interests of fairness and of making a fully informed decision in the instant case.

16. The Plaintiff suffers no prejudice by the granting of such a modest extension.

WHEREFORE, Defendant Patrick G. Grady should be granted an extension of time to file a Reply on or before July 7, 2015, and all other relief that is just and proper.

Wednesday, June 24, 2015

Respectfully submitted,

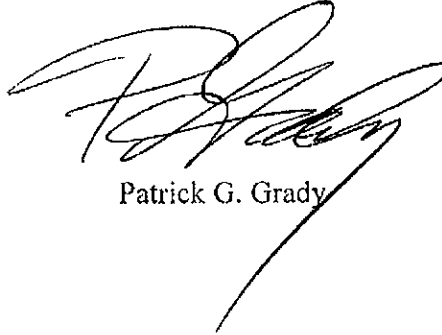


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Patrick G. Grady  
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**CERTIFICATE OF SERVICE**

I certify that on the 24<sup>th</sup> day of June, 2015, I served a copy of this Motion on William M. Schmalfeldt by First Class U.S. Mail.

A handwritten signature in black ink, appearing to read 'P. Grady', with a long, sweeping underline that extends below the printed name.

Patrick G. Grady